## UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

Sysco Chicago, Inc.,	)
Plaintiff,  v.  Christ Panos Foods Corporation and Aaron Moore,  Defendants.	) ) ) Case No. 19-CV-05361 ) Judge Edmond E. Chang ) Magistrate Judge Susan E. Cox
Defendants.	)

## JOINT MOTION FOR ENTRY OF AGREED PERMANENT INJUNCTION AND FINAL JUDGMENT

Plaintiff Sysco Chicago, Inc. ("Sysco") and Defendants Christ Panos Foods Corporation ("Christ Panos") and Aaron Moore ("Moore") (collectively, the "Parties") submit this Joint Motion for Entry of Agreed Permanent Injunction and Final Judgment, and respectfully show the Court as follows:

- 1. Sysco filed this lawsuit on August 8, 2019, alleging that Moore misappropriated Sysco's confidential and trade secret information and breached certain covenants contained in his Sysco Protective Covenants Agreement. Sysco further alleged that Panos Foods interfered with certain of these covenants.
- 2. Sysco and Defendants have agreed to and executed a settlement agreement, which resolves all of the claims asserted in this lawsuit.
- 3. As part of the settlement agreement, Defendants have agreed to entry of the attached Agreed Permanent Injunction and Final Judgment ("Agreed PI"), without a hearing or trial. See Exhibit A.

4. Also as part of the settlement agreement, Defendants have agreed to the entry of the Final Computer Forensics Protocol, attached hereto at Exhibit B.

WHEREFORE, Plaintiff Sysco Chicago, Inc. ("Sysco") and Defendants Christ Panos Foods Corporation ("Christ Panos") and Aaron Moore ("Moore") respectfully request that the Court enter the proposed Agreed Permanent Injunction and Final Judgment.

Respectfully submitted,

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**CERTIFICATE OF SERVICE** 

I, Anthony R. Todd, certify that on October 25, 2019, this Joint Motion for Entry of Agreed

Permanent Injunction and Final Judgment was electronically filed with the Clerk of Court using

the Court's CM/ECF system which will notify all counsel of record at their e-mail addresses on

file with the Court.

By: /s/ Anthony R. Todd\_

Anthony R. Todd

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